BEFORE THE RECEIVED POSTAL RATE COMMISSION 2 12 34 PM '97

POSTAL RATE COMMISSION OFFICE OF THE SECRETARY

POSTAL RATE AND FEE CHANGES, 1997

DOCKET NO. R97-1

FIRST SET OF INTERROGATORIES AND REQUESTS FOR PRODUCTION OF DOCUMENTS FROM UNITED PARCEL SERVICE TO UNITED STATES POSTAL SERVICE WITNESS BARON (UPS/USPS-T17-1)

(August 12, 1997)

Pursuant to the Commission's Rules of Practice, United Parcel Service hereby serves the following interrogatories and requests for production of documents directed to United States Postal Service witness Baron (UPS/USPS-T17-1).

Respectfully submitted,

John E. McKeever Albert P. Parker

Stephanie Richman

Attorneys for United Parcel Service

Schnader Harrison Segal & Lewis LLP 1600 Market Street, Suite 3600 Philadelphia, PA 19103-7286 (215) 751-2200

and 1913 Eye Street, N.W., Suite 600 Washington, D.C. 20006-2106 (202) 463-2900

Of Counsel.

INTERROGATORIES OF UNITED PARCEL SERVICE TO UNITED STATES POSTAL SERVICE WITNESS BARON

UPS/USPS-T17-1. Please provide the number of new delivery addresses for each year from FY 1987 (or, if not available by fiscal year, by calendar year) up to and including FY 1996 (or calendar year 1996).

CERTIFICATE OF SERVICE

I hereby certify that I have this date served the foregoing document in accordance with section 12 of the Commission's Rules of Practice.

Stephanie Richman

Dated: August 12, 1997

Philadelphia, Pa.